

NC DHHS – NC DMH/DD/SAS
Professional Treatment Services in Facility-Based Crisis Program (FBC)
Endorsement Check Sheet Instructions

Introduction

Prior to site and service endorsement, business verification must take place. In the process of business verification, the business information presented DMA CIS (Community Intervention Services) application is validated. At that time, the provider organization submits a self study of the core rules (10A NCAC 27G .0201-.0204) verifying that they have met all the requirements therein. (The provider is not required to submit this if nationally accredited, licensed with Division of Health Services Regulation (DHSR) or has had a compliance review from NC Council of Community Programs within the past three years.) The documents created in adherence with the core rules should be utilized as evidence of provider compliance where noted in the check sheet and instructions.

The following set of instructions is to serve as general guidelines to facilitate the review of providers for endorsement. Service definition, core rules (as noted above), staff definitions (10A NCAC 27G .104) and other DHHS communications (e.g. *DMH/DD/SAS Records Management and Documentation Manual*, Communication Bulletins, Implementation Updates, Clinical Coverage Policy 8A, and other publications) should be used to support the reviewer's determination of compliance. In addition, the Business Entity Type Reference document assists to clarify the requirements for different business entities such as corporation, partnerships and limited liability corporations and partnerships. On the endorsement check sheet, there are suggested sources of evidence for locating information that may assist the reviewer in determining compliance with the respective requirements. The items identified are not an exhaustive list of sources, nor must each item named be reviewed. The reviewer examines evidence presented only until the element in question is substantiated as being met by the provider.

Provider Requirements

In this section, the provider is reviewed to ascertain that administrative requirements are met in order for services to be provided. The provision of services is addressed later in this endorsement process. This section is reviewed only during the initial review for business status and does not require further scrutiny unless there is a change in the provider's status that would affect this element.

- a.** Review identified documents for evidence the provider meets DMH/DD/SAS standards as related to administration responsibilities, financial oversight, clinical services and quality improvement. These standards include, but are not limited to, policies and procedures (contents of which are mandated in 10A NCAC 27G .0201 – Governing Body Policies) and the key documents required by law for the formation of the business entity. (Refer to attachment titled Business Entity Type.)
- b.(1).** Review documentation that demonstrates provider is a legal US business entity. Documentation should indicate the business entity is currently registered with the local municipality or the office of the NC Secretary of State, that the information registered with the local municipality or the Secretary of State is current, and that there are no dissolution, revocation or revenue suspension findings currently attached to the provider entity. Also review corporate documentation demonstrating registration to operate a business in NC.

Information for corporate entities may be verified on the web site for the Secretary of State. (Refer to key documents section of attachment titled Business Entity Type.)

- b.(2).** Review the policy and procedure manual. It should contain language indicating intent to have national accreditation within one (1) year of enrollment with DMA. Review DMA enrollment document to verify provider's date of enrollment. Once the provider has been enrolled with DMA for a period of one (1) year, a certification of national accreditation or some other evidence supporting the provider organization's achievement of national accreditation must be produced and validated.

Staffing Requirements

In this section, the reviewer is primarily concerned with the hiring practices of the provider and ensuring that all employees required per the service definition are in place at the time of the clinical interview and are equipped with the evidentiary documentation of education, training and experience for which they were hired. This is important for the clinical integrity of the service. The review of the provision of services is more thoroughly examined in the "Program/Clinical Requirements" section of the endorsement review.

In the desk review, the reviewer is to verify that the provider agency's policies and procedures, as well as other administrative manuals meet the requirements of the service definition. The review of the qualifications of personnel hired will occur later in the endorsement process. Review documentation to verify that provider agency requirements of staff include degrees, licensure and/or certifications that comply with the position as written in the service definition, and are consistent with requirements and responsibilities of their respective job duties. Review job descriptions to determine that the roles and responsibilities identified do not exceed the qualifications of the position. This review ensures that the provider has an understanding of the service definition staffing requirements and has established policies for a program that meet those requirements.

For the clinical interview, review staff employment applications, resumes, licenses, certifications and/or other documentation for evidence that degrees and work experience with the target population the provider will be serving is consistent with the requirements and responsibilities of each position. If **any** staff person hired to meet the staffing requirements of the service definition do not meet the requirements for the position, then the clinical interview does not take place. The clinical interview process is described in Program Requirements.

For the on site review, the endorsing agency verifies documentation reviewed during the desk review and clinical interview (if it has been conducted prior to the on site review). The credentials and qualifications of any additional or ancillary staff hired in the time between the desk review and the on site review are examined.

For the 60 day review, include a review of the consumer record and other items necessary to determine that staff are performing clinical interventions commensurate with their credentials and qualifications as well as within the scope of work the their job descriptions. Review staff schedules, attendance rosters, and caseload assignments and interview staff to ascertain consumer to staff ratios. This review should also include a review of supervision plans, notes and documentation of clinical supervision for all staff. Review supervision plans to ensure that they are individualized and appropriate for the level of education, skill and experience of staff. Review supervision notes, schedules and other supporting documentation that demonstrate on-going supervision consistent with the requirements and responsibilities. Personnel records must demonstrate evidence that all required

training has been acquired by each staff member delivering day treatment services and completed within the specified time frames.

- a. Policy and procedure manuals, program description, and job descriptions should reflect that the Facility-Based Crisis (FBC) Program is operated under the direction of a physician and ensures the staffing ratios of 1:6 for adult mental health consumers and 1:9 for substance abuse recipients. If there is a mixture of consumers the staff ratio should meet the ratio of 1:6. Policy should reflect staff training and experience with regard to the composition of the population served. Review employment application, resume, license, certification, or other documentation for evidence of degree and work experience with the target population the provider will serve and consistent with requirements and responsibilities of the positions. In some cases, reviewer may need to verify the source of the degree to ensure that it is a credible and valid degree. Review employee training plans or other documentation demonstrating training has been scheduled and/or received according to core rules, consistent with the role of the level of the professional providing the FBC service. Staff files should reflect training and experience consistent with the population served in the FBC program.

Service Type/Setting

The elements in this section pertain to the provider's having an understanding of the FBC and the service delivery system.

For the desk review, review documentation to verify that provider demonstrates a schedule of operation, locations of service and interventions provided are within the parameters specified by the service definition. This review ensures that the provider has an understanding of the purpose of the service and has established a schedule and a program that meet those requirements.

Items in this section do not apply to the clinical interview.

For the on site review, confirm findings of the desk review.

For the 60 day review, include a review of consumer records and other items necessary to determine that FBC is being provided to consumers who meet the eligibility requirements.

- a. Review of the policy and procedure manuals, program descriptions, and/or other records should document that FBC is provided in a twenty-four hour service site and should contain language that demonstrates the required elements of the FBC service.
- b. The reviewer should verify documentation that the facility is licensed under 10A 27G.5000.

Program/Clinical Requirements

The elements in this section are reviewed as they pertain to service delivery. It is important that consumers are served in accordance with the service definition according to individual needs in regard to the frequency, intensity and type of therapeutic interventions. Interventions should reflect clinically recognized models of crisis interventions for the appropriate age and disability of the consumer.

For the desk review, review documentation to verify that the provider demonstrates a clear understanding of the service definition and the crisis stabilization.

For the clinical interview utilize the questions attached to the current endorsement policy. Specific expectations for the clinical interview are outlined below.

For the on site review, confirm findings of the desk review and the clinical interview.

For the 60 day review, a review of service records should demonstrate compliance with program requirements as specified in each item below. Review to verify that the provider has an understanding of FBC and crisis stabilization. Review documentation to determine clinical integrity, coordination other services and supports in delivery of services and documented interventions.

- a.** This service is an intensive short-term, medically supervised service that is provided in certain 24-hour service sites. Policy and procedure manuals, program descriptions and/or other documentation must include the program objectives that include: assessment and evaluation of the condition(s) that have resulted in the need for FBC; and intensive treatment, behavioral management interventions, or detoxification protocols. Policy and procedure manuals, program descriptions and/or other documentation must reflect the goals aimed to stabilize the immediate problems; to ensure the safety of the individual consumer by closely monitoring his/her medical condition and response to the treatment protocol; and to arrange for linkage to services that will provide further treatment and/or rehabilitation upon discharge from FBC. A review of the consumer record should reflect the medical aspects of the treatment plan where necessary, such as medication management, and detoxification protocols. Interventions for all conditions noted above should be evident in the individual consumer record as appropriate (i.e., SA resources, including discharge planning, should be available if SA is identified as a primary or secondary problem).
- b.** This service is designed to provide interventions that provide the support and treatment to prevent, stabilize, and/or manage the crisis event or sub-acute care needs of the individual. Policy and procedures manuals, program descriptions and/or other records must include evidence that the supports and treatments to this end are provided on site. The supports and treatments should have the capacity to address an increase in the level of functioning of recipients in all identified domains. A review of the consumer record should reflect in the treatment plan the planned provision of individualized supports and treatment in the necessary domains to improve the level of functioning of the recipient. The consumer record should also include evidence of skill building, increasing coping abilities and the sustaining of such prior to discharge.
- c.** Clinical Interview. Use the questions included in the current endorsement policy for interviews with the staff to determine the provider agency's clinical competency to deliver services. A minimum of three (3) staff members/positions must be interviewed. Those interviewed should include at least the Program Director and two other fulltime staff members. If there are licensed individuals on staff, it is recommended that at least one of those individuals be interviewed.

Documentation Requirements

- a.** All contacts for FBC services must be documented - a daily service note is the minimum requirement. Documentation must meet all record and documentation requirements in the DMH/DD/SAS Records Management and Documentation Manual. Review policy and procedure manuals for language that demonstrates that all contacts with or on behalf of the recipient must be recorded in the service record. Review policy and procedure manuals and job descriptions for language demonstrating the provider will ensure service documentation is completed per Medicaid guidelines. Review policy and procedure manuals for language which addresses completion of required forms, transition and discharge planning.

The 60 day follow-up review should include a review of service records to verify that all components of each full service note are included in the documentation and to verify that contacts are documented.